

SWORN STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT
SPECIAL AGENT KRYSTAL STEVENSON
UNITED STATES v. FRANK RAY BERRIS

I, Krystal Stevenson, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since April 2021. I am currently assigned to the ATF Cheyenne Field Office and am responsible for the investigation of violations of federal firearms, explosives, and arson laws.
2. I have received extensive law enforcement training at the Department of Homeland Security's Criminal Investigative Training Program and the ATF's Special Agent Basic Training at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. This six-month training program covered subject matters that included federal criminal statutes, interviewing techniques, arrest procedures, use of force, search and seizure authority, narcotics, undercover techniques, search warrant applications, and various other investigative techniques.
3. As a Special Agent with the ATF, I have experience and am responsible for investigating violations of federal criminal law. Throughout my career, I have participated in and conducted investigations which have resulted in the arrests and convictions of individuals involved in illegal firearms activity, including violations of the Gun Control Act, 18 U.S.C. §§ 921 – 931 (Chapter 44 of Title 18, United States Code), and violations of the National Firearms Act, 26 U.S.C. §§ 5801 – 5872 (Chapter 53 of Title 26, United States Code).

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officials, witnesses, and physical evidence to include surveillance footage. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not set forth all my knowledge about this matter. To the best of my knowledge and belief, all statements made in this affidavit are true and correct.
5. This affidavit is submitted in support of an arrest warrant and criminal complaint charging **Frank Ray BERRIS** (DOB 05/31/1971) with the violation of Title 18 U.S.C. § 922(g)(1), Felon in Possession of a Firearm. I submit probable cause exists to believe that on or about February 3, 2024, in the State and District of Wyoming, **BERRIS** did knowingly possess a firearm, that is: a Ruger, model SR-556, .223 caliber rifle bearing serial number 59031481.
6. On November 9, 2022, Wyoming Highway Patrol Trooper Biant pulled **BERRIS** over for speeding. The vehicle was a black Ford Explorer with plates that said “Wyoming, Private Property, No Trespassing, American State National.” Trooper Biant made contact with **BERRIS** who only provided a passport for identification. **BERRIS** was uncooperative with questioning and Trooper Biant went back to his vehicle to check for wants or warrants for **BERRIS**. **BERRIS** had a warrant for Failure to Comply with no driver’s license and Failure to Appear for no driver’s license, registration, and no insurance. Trooper Biant went back to **BERRIS**’s vehicle and asked if the vehicle was registered, and **BERRIS** informed him that he was a sovereign individual and that he could travel freely down public roads. Trooper Biant noticed that **BERRIS** appeared to be agitated throughout the

conversation and he waited for backup before he approached **BERRIS** again. WHP Lt. Cross and Natrona County Sheriff's Office Corporal Christensen arrived on scene.

7. **BERRIS** continued to be uncooperative with law enforcement and refused to exit his vehicle despite multiple instructions to step out of the vehicle. **BERRIS** was informed that if he refused to exit the vehicle, he would be forcibly removed. **BERRIS** stated, "I am telling you, if you do that, this is going to go south quick" further stating, "we're gonna have a gun fight on the side of the road..." Corporal Christensen watched as **BERRIS** pulled up the right side of his top garment, revealing what appeared to be a pistol in a holster on his waist. The firearm appeared to be glossy black and had wooden side panels on the grip. The holster was brown in color, possibly leather.
8. It should be noted that **BERRIS** was free to leave as warrants would be issued at a later date for Speeding, Operating a Vehicle without Registration, Interference, Using a Sovereign Plate, and Unlawful Use of a Firearm. The firearm was not seized during the stop.
9. On December 15, 2022, Fremont County Deputy Phillips pulled **BERRIS** over for speeding. Deputy Phillips also observed the vehicle was not registered. After **BERRIS** pulled over, Deputy Phillips approached the vehicle and **BERRIS** stated he did not have registration as he was a sovereign citizen. Deputy Phillips was advised that **BERRIS** had a warrant out of Natrona County from the events on November 9, 2022. When Deputy Phillips informed **BERRIS** he had a warrant, **BERRIS** made a comment to the other passengers in the vehicle, "Are we going to

shoot it out boys.” The passengers were identified as Daniel Miller (DOB 09/22/1946, 322 Tamarisk Drive, Riverton, Wyoming) and Ragan Cooper (DOB 08/24/1963, 137 Shady Lane, Pavillion, Wyoming).

10. **BERRIS** eventually agreed to get out of the vehicle. As he was exiting his vehicle, he removed a firearm from his person and handed it to Miller. Deputy Phillips described the firearm as a Kimber, Model 1911, .45 caliber pistol. **BERRIS** was arrested without further incident. The firearm was not seized by law enforcement at that time.
11. Upon arrival at the Fremont County Detention Center, staff located a loaded magazine on **BERRIS’s** person. This magazine was released to Cooper the following day.
12. On February 3, 2024, at approximately 0745 hours, Wyoming Highway Patrol Trooper Kyle O’Malley conducted a traffic stop on a 2013 black Ford Explorer bearing plates, “United States of America Republic Diplomat Foreign National” and “UCC1-308.” This stop occurred on U.S. Hwy 20/26 at mile marker 17. Trooper O’Malley noticed the plates did not appear to be a license plate that he recognized and thought it may be fictitious. When Trooper O’Malley approached the vehicle, **BERRIS** identified himself, told Trooper O’Malley that he was a sovereign citizen and provided a passport card as a form of identification. **BERRIS** was the only occupant in the vehicle. Trooper O’Malley noticed what appeared to be a pistol in a holster between the driver’s seat and center console, and an AR style rifle between the center console and passenger seat. Trooper O’Malley also

determined **BERRIS** did not have a valid driver's license or insurance on the vehicle. The vehicle was not registered.

13. **BERRIS** was arrested and his vehicle was towed from the location of the stop to 900 Bryan Stock Road, Casper, Wyoming 82601.
14. On February 3, 2023, FBI Agent JT Baker, along with Wyoming Highway Patrol Troopers and Natrona County Sheriff's Office Deputies, executed a federal search warrant on **BERRIS's** vehicle (2013 black Ford Explorer bearing plates, "United States of America Republic Diplomat Foreign National" and "UCC1-308") at 900 Bryan Stock Road, Casper, Wyoming 82601. Law enforcement located a Ruger, model SR-556, .223 caliber rifle bearing serial number 59031481, in addition to two other firearms and multiple rounds of ammunition. Based on my training and experience, as well as speaking to other experienced ATF agents, the Ruger rifle was made outside of the State of Wyoming.
15. I confirmed that **BERRIS** has multiple felony convictions including a 2009 conviction in the State of Illinois for Unlawful Possession of a Weapon by a Felon.
16. Based on my training, education, and experience, and the information provided to me, I believe **BERRIS** violated Title 18 U.S.C. § 922(g)(1), by knowingly possessing a firearm as a convicted felon.

END OF SWORN STATEMENT